

Jonas V. Anderson, VA SB #78240
Acting Assistant United States Trustee
Carla Gowen McClurg, OSB #165144
Trial Attorney
U.S. Department of Justice
Office of the United States Trustee
620 SW Main Street, Suite 213
Portland, OR 97205
Tel: (503) 326-7659
Email: carla.mcclurg@usdoj.gov

Attorneys for Gregory M. Garvin,
Acting United States Trustee for Region 18, Plaintiff

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON**

In re

Case No. 16-33185-pcm7

Peter Szanto,

Debtor.

United States Trustee,

Adversary No. 18-03022-pcm

Plaintiff,

v.

Peter Szanto,

Defendant.

**DECLARATION OF CARLA
GOWEN McCLURG IN SUPPORT
OF UNITED STATES TRUSTEE'S
OBJECTION TO DEFENDANT'S
MOTIONS TO QUASH
SUBPOENAS**

I, Carla Gowen McClurg, hereby declare under penalty of perjury:

1. I am an attorney for the United States Trustee, the plaintiff in the above-referenced adversary proceeding. I have personal knowledge of the matters contained herein.
2. On September 12, 2018, I supervised United States Trustee Paralegal Specialist Michael Connolly in mailing out by first-class United States Mail notices of subpoenas with a copy of the subpoena addressed to defendant Peter Szanto ("Defendant") at 11 Shore Pine, Newport Beach, CA 92657.

**Page 1 – DECLARATION OF CARLA GOWEN McCLURG IN SUPPORT OF
UNITED STATES TRUSTEE'S OBJECTION TO DEFENDANTS MOTIONS TO
QUASH SUBPOENAS**

3. On September 12, 2018, I emailed to Defendant notices of subpoenas with a copy of the subpoenas to be issued as PDF attachments to szanto.pete@gmail.com. A true and correct copy of my September 12, 2018 email to Defendant with all attachments is attached to this declaration as Exhibit 1.

4. On September 13, 2018, I supervised United States Trustee Paralegal Specialist Michael Connolly in serving subpoenas on banks and financial institutions consistent with the cover letters addressed to each entity with a copy of the letters, subpoenas, and related documents to Defendant by first-class United States Mail addressed to Defendant at 11 Shore Pine, Newport Beach, CA 92657.

5. On September 26, 2018, I supervised United States Trustee Paralegal Specialist Michael Connolly in mailing out by first-class United States Mail a notice of subpoena to be issued to Ford Motor Credit Company, LLC/Ford Interest Advantage with a copy of the subpoena addressed to Defendant at 11 Shore Pine, Newport Beach, CA 92657.

6. On September 26, 2018, I emailed to a notice of subpoena to be issued to Ford Motor Credit Company, LLC/Ford Interest Advantage with a copy of the subpoena as a PDF attachment to Defendant at szanto.pete@gmail.com. A true and correct copy of my September 26, 2018 email to Defendant with the attachment is attached to this declaration as Exhibit 2.

7. On September 27, 2018, I supervised United States Trustee Paralegal Specialist Michael Connolly in serving a cover letter, Subpoena dated September 26, 2018; and blank Declaration of Custodian of Records on Ford Motor Credit Company LLC/Ford Interest Advantage at the address listed on the cover letter with a copy to Defendant.

DATED this 1st October, 2018.

/s/ Carla Gowen McClurg
Carla Gowen McClurg

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2018, I served a copy of the foregoing

**DECLARATION OF CARLA GOWEN McCLURG IN SUPPORT OF UNITED STATES
TRUSTEE'S OBJECTION TO DEFENDANTS MOTIONS TO QUASH SUBPOENAS**

with all attached exhibits by mailing a copy of this document, by United States first class mail,
postage prepaid, addressed to the following:

Peter Szanto
11 Shore Pine
Newport Beach, CA 92657

I further certified that I emailed a copy of the foregoing document with all exhibits to the
defendant on October 1, 2018 at the following email address: szanto.pete@gmail.com.

GREGORY M. GARVIN
Acting United States Trustee for Region 18

/s/ Carla Gowen McClurg
CARLA GOWEN McCLURG, OSB #165144
Trial Attorney